

**UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF NEW HAMPSHIRE**

COALITION FOR OPEN DEMOCRACY,
et al.,

Plaintiffs,

v.

DAVID M. SCANLAN, in his official capacity
as New Hampshire Secretary of State, *et al.*,

Defendants.

Case No. 1:24-cv-00312-SE-TSM

**JOINT MOTION TO EXTEND TIME FOR DEFENDANTS TO
OBJECT TO PLAINTIFFS' MOTION TO COMPEL**

NOW COME all parties, by and through their respective counsel, and jointly request that the Court extend Defendants' deadline to object to Plaintiffs' Motion to Compel (ECF No. 92), and state as follows:

1. On July 25, 2025, Plaintiffs filed a Motion to Compel Responsive Documents, seeking expedited treatment. ECF No. 92. The Court ordered Defendants to file any objection on or before July 30, 2025. End. Order (July 28, 2025).
2. On July 29, Defendants filed an Assented-To Motion to Extend Time to Object to Plaintiffs' Motion to Compel. ECF No. 94. The Court granted Defendants' Motion to Extend Time. End. Order (July 30, 2025).
3. Simultaneously with this Joint Motion to Extend Time, the parties filed a Joint Motion for Entry of Stipulated Claw Back Agreement and Order. ECF No. 95.
4. If the Court grants the Joint Motion for Entry, Plaintiffs will withdraw their Motion to Compel. The Court will not likely consider the parties' Joint Motion for Entry, however, before Defendants' time to object to the Motion to Compel has expired.

5. Accordingly, the parties respectfully request that the Court extend Defendants' time to object to the Motion to Compel by one week, to August 8, 2025.

6. Local Rule 7.1(a)(2): Due to the nature of the relief requested, no memorandum of law is required.

7. Local Rule 7.1(c): All parties to this lawsuit assent to this Motion and the relief requested.

8. Local Rule 7.2(a): Neither this Motion nor its requested relief will result in the continuance of any currently scheduled trial or hearing.

Prayer for Relief

WHEREFORE, the parties respectfully request that this Honorable Court:

- A. Grant this Motion;
- B. Extend Defendants' deadline to object to the Motion to Compel to August 8, 2025;
and
- C. Grant such further relief as is just and equitable.

Respectfully submitted,

DEFENDANTS DAVID M. SCANLAN, in his
official capacity as New Hampshire Secretary of
State and JOHN M. FORMELLA, in his official
capacity as New Hampshire Attorney General

By their attorney,

JOHN M. FORMELLA
ATTORNEY GENERAL

Date: August 1, 2025

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and

COALITION FOR OPEN DEMOCRACY,
LEAGUE OF WOMEN VOTERS OF NEW
HAMPSHIRE, THE FORWARD
FOUNDATION, MCKENZIE NYKAMP
TAYLOR, DECEMBER RUST, STEVEN
BORNE (as father and next friend of MILES
BORNE), and RUSSELL MUIRHEAD (as
father and next friend of ALEXANDER
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By their attorneys,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on all parties of record through the Court's e-filing system.

/s/ Michael P. DeGrandis

Michael P. DeGrandis